

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Tennessee Actions Against Specialty
Surgery Center, PLLC and Dr. Kenneth Lister

MDL No. 2419
Master Docket No.: 1:13-md-2419-RWZ

Honorable Rya W. Zobel

DEMAND FOR JURY TRIAL

**PLAINTIFFS' STEERING COMMITTEES' MOTION FOR LEAVE TO FILE
EXHIBITS UNDER SEAL**

The Plaintiffs' Steering Committee (the "PSC") moves this Honorable Court, pursuant to Local Rule 7.2, to allow Exhibits 1 through 3, 5, 7, 8, 13, 15 and 16 to the Declaration of Benjamin A. Gastel in Support of the Plaintiffs' Steering Committee's Motion to Compel Specialty Surgery Center and Dr. Kenneth Lister to Respond to Produce Certain Documents, to be filed under seal.

These exhibits have been designated as Confidential pursuant to this Court's Protective Order No. 3 (Dkt. 814) by the parties.

WHEREFORE, the PSC respectfully requests that the Court allow the Confidential Exhibits to the Declaration in Support of the PSC's Motion to Compel be filed under seal.

December 11, 2015

Respectfully submitted,

s/ Benjamin A. Gastel

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Benjamin A. Gastel

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: December 11, 2015

/s Benjamin A. Gastel
Benjamin A. Gastel